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16 UNITED STATES BANKRUPTCY COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION  
19

20 In re  
21 THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

22 Debtor and  
23 Debtor in Possession.  
24

Case No. 23-30564  
Chapter 11

**DECLARATION OF FR. PATRICK  
SUMMERHAYS IN SUPPORT OF  
DEBTOR'S MOTION TO APPROVE  
COMPROMISE AND STIPULATION  
MODIFYING THE AUTOMATIC STAY**

25 Date: September 4, 2025  
26 Time: 1:30 p.m.  
Location: via Zoom  
27 Judge: Hon. Dennis Montali  
28

1 I, Fr. Patrick Summerhays, hereby declare as follows:

2 1. I am the Vicar General and Moderator of the Curia of The Roman Catholic  
3 Archbishop of San Francisco, the debtor and debtor in possession herein (the “RCASF” or the  
4 “Debtor”). I have personal knowledge of the facts set forth herein, which are known by me to be  
5 true and correct, and if called as a witness, I could and would competently testify thereto.

6 2. All facts set forth in this declaration are based on my personal knowledge, upon  
7 information supplied to me by people who report to me, upon my review of relevant documents, or  
8 upon my opinion based on my experience and knowledge with respect to the RCASF’s operations,  
9 financial condition, and related business issues. The documents submitted herewith, referenced  
10 herein or otherwise relied upon by me for purposes of this Declaration are the business records of  
11 the RCASF, prepared and maintained in the ordinary and regularly conducted business activity of  
12 the RCASF, and used by me for those purposes. If I were called upon to testify, I could and would  
13 testify competently to the facts set forth herein, and I am authorized to submit this Declaration on  
14 behalf of the RCASF.

15 3. I submit this declaration (“Declaration”) in support of the above-referenced Motion  
16 for entry of an order, substantially in the form attached to the Motion as *Exhibit A* (the “Proposed  
17 Order”): (a) approving the stipulation attached as *Exhibit 1* to the Proposed Order (the “Stipulation”)  
18 modifying the automatic stay for the limited purposes described in the Motion and in the Stipulation;  
19 (b) approving the Motion and authorizing the Debtor to take all actions necessary to effectuate the  
20 Stipulation; (c) waiving the fourteen (14) day stay period imposed on the order; and (d) granting  
21 such other and further relief as the Court deems just and proper under the circumstances

22 4. I have reviewed the complaint filed in the Adversary Proceeding, the Injunction  
23 Motion (which as defined in the Injunction Motion includes the supporting declarations), and the  
24 Stipulation. I am aware that the Committee filed an opposition to the Injunction Motion.

25 5. In my opinion and to my knowledge, modifying the stay upon the limited terms set  
26 forth in the Stipulation, to allow the 5 Released State Court Actions to go forward in exchange for a  
27 stay of litigation of the remaining Affiliate State Court Actions dramatically alleviates the burden of  
28 litigation, and allows the Debtor, the Debtor’s professionals, and many of the Non-Debtor Affiliates

1 and their professionals, to focus their attention on the mediation, and on their collective efforts to  
2 reach a prompt consensual resolution of this Bankruptcy Case. The Debtor believes that the  
3 Stipulation is in the best interests of the Debtor's estate and its creditors because it resolves the  
4 Injunction Motion with little to no additional expense to the estate.

5 6. It is my opinion that the Stipulation is adequate, fair, and reasonable, and is in the  
6 best interests of the estate and creditors.

7 I declare under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct. Executed on July 30, 2025, at San Francisco, California.

9  
10   
11 Fr. Patrick Summerhays